

Montgomery HOSPICE

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Hospice at Home

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June 8, 2005

Pamela W. Barclay
Interim Executive Director
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, MD 21215

Dear Ms. Barclay:

Thank you for the opportunity to provide comment to the Maryland Health Care Commission's Certificate of Need (CON) Task Force. Montgomery Hospice strongly supports the current CON program in Maryland as it governs hospice care. We concur with the views expressed by the Hospice Network of Maryland and recommend that you make no changes to the current CON process for hospice care providers.

Our jurisdiction, Montgomery County, is currently served by eight hospice providers. Residents of our community clearly have ample choice among providers under the current system. We fear that if the CON process were altered or done away with, for-profit hospice providers would rapidly enter the market, driving down quality of care as they sought aggressive growth and profits. Since hospices are mandated to provide extensive un-reimbursed services such as bereavement care, we believe the temptation for "for-profit" companies to reduce or restrict services poses a very real threat to the community. In fact, one of the larger for-profit hospice providers, Odyssey Hospice, is already under investigation by the Department of Justice for this kind of behavior.

Furthermore, the entry of new competitors harms Montgomery Hospice's Casey House. Casey House has cared for thousands of Maryland residents over the past six years. Montgomery Hospice has made a significant investment in inpatient hospice care, and the community deserves to have this jewel maintained.

I urge you to retain the current requirements for CON for hospice in Maryland.

Sincerely,



Ann Mitchell, MPH
President & CEO